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DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations:

7/24/2019

Completion date for Phase I Discovery as agreed upon by the parties:
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

9/24/2019

Date for initial settlement conference:

(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)

10/24/2019

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings:
(Presumptively 15 days post initial settlement conference)

11/15/2019

First requests for production of documents and for interrogatories due by:
(Presumptively 15 days post joining/amending)

1/2/2020

All fact discovery completed by:
(Presumptively 3.5 months post first requests for documents/interrogatories)

5/2/2020

Exchange of opening expert reports completed by:
(Presumptively 30 days post fact discovery)

6/2/2020

Exchange of rebuttal expert reports completed by:

7/2/2020

Expert depositions completed by:
(Presumptively 30 days post expert reports)

8/3/2020

COMPLETION OF ALL DISCOVERY BY:
(Presumptively 9 months after Initial Conference)

9/2/2020

Final date to take first step in dispositive motion practice:
(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)

10/2/2020

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?

Plaintiff: Yes

Defendant: No